

Guidelines for pet food exports to the EU, April 1997

Definitions

Council Directive 90/667/EEC defines several things - animal waste, high-risk animal material (animal waste) and low-risk animal material (animal waste). In the following definitions, the first part of the text is the actual language from the Directive, and the text in italics is the interpretation or simple definition for daily use.

Animal waste: carcasses or parts of animals or fish, or products of animal origin not intended for direct human consumption, with the exception of animal excreta and catering waste (*any animal-origin raw material going into rendered products.*)

High-risk material: any animal waste which meets the following descriptions:

- (a) all bovine animals, pigs, goats, sheep, solipeds, poultry and all other animals kept for agricultural production, which have died on the farm but were not slaughtered for human consumption, including stillborn and unborn animals;
- (b) dead animals not referred to in point (a) but which are designated by the competent authority of the Member State;
- (c) animals which are killed in the context of disease control measures either on the farm or in any other place designated by the competent authority;
- (d) animal waste including blood originating from animals which show, during the veterinary inspection carried out at the time of slaughtering, clinical signs of diseases communicable to man or other animals;
- (e) all those parts of an animal slaughtered in the normal way which are not presented for post-mortem inspection, with the exception of hides, skins, hooves, feathers, wool, horns, blood and similar products;
- (f) all meat, poultrymeat, fish, game and foodstuffs of animal origin which are spoiled and thus present a risk to human and animal health;
- (g) animals, fresh meat, poultrymeat, fish, game and meat and milk products, imported from third countries, which in the course of the inspections provided for in community legislation fail to comply with the veterinary requirements for their importation into the Community, unless they are re-exported or their import is accepted under restrictions laid down in Community provisions;
- (h) without prejudice to instances of emergency slaughtering for reasons of welfare,

farm animals which have died in transit;

- (i) animal waste containing residues of substances which may pose a danger to human or animal health; milk, meat or products of animal origin rendered unfit for human consumption by the presence of such residues;
- (j) fish which show clinical signs of diseases communicable to man or to fish.

(high-risk material: anything that died (other than at slaughter) that was not presented for ante-mortem inspection)

Low-risk material (animal waste): animal waste other than that covered in high-risk definition *(anything that has passed ante-mortem inspection and been presented for post-mortem inspection)*

Background

In Directive 90/667 the European Community (EC) stated that all high-risk material as defined must be rendered at 133°C, 3 bars pressure, for 20 minutes. After the EC passed this directive, they realized it would be very difficult for their own renderers to comply. The EC then passed Decision 92/562/EEC which provided for alternative heat treatments for high-risk material. Subsequent research showed that only some of the alternative heat treatments were effective against the BSE organism and none of the alternative heat treatments were effective against the scrapie organism. So, in 1996, the EC passed Decision 96/449, which established parameters that must be used in the treatment of mammalian waste, in order to address the issue of TSE agents.

Decision 96/449/EEC went into effect April 1, 1997. This Decision states that all mammalian waste must be treated in accordance with the following minimum parameters:

maximum particle size	50 mm
temperature	133°C
time	20 minutes
pressure	3 bar

This Decision contains some exemptions; most significantly, this Decision does not apply to the 'processing of low risk material within the meaning of Directive 90/667/EEC for the production of pet food.' This means that mammalian low risk material used for the production of pet food does not have to be rendered at the specified parameters.

Two other pieces of legislation have been adopted recently and took effect April 1, 1997. These are Decision 97/198/EC, which provides a certificate for the import of processed animal protein from certain third countries, and Decision 97/199/EC, which provides a certificate for the import of petfood in hermetically sealed containers from certain third countries. Both of these decisions reflect the Commission's acceptance of our approval program for alternative heat treatments of non-mammalian waste. Non-mammalian proteins, such as poultry meal or poultry by-product

meal, which are incorporated into petfood intended for export to the EU, must come from a rendering facility which has been approved by APHIS according to the standards previously outlined last year. These non-mammalian rendering facilities do not need to make a distinction between high and low risk material, since the approval of alternative heat treatments overcomes this problem.

The issue of separating high and low risk material remains, however, for mammalian products. The current options for mammalian products are essentially limited to the following: (a) low risk material as direct input into petfood production, (b) low risk material as input into rendered protein production, or (c) high risk material as input into a rendering facility for treatment at 133°C, 3 bars pressure, for 20 minutes. Rendering facilities which are either treating only low risk material or which are utilizing the 133°C treatment need to be approved by APHIS specifically for these options.

Tips on Completing EU Certificates for Petfood

Which certificate to use? - also see attached charts

1. Annex B, Animal Health Certificate 97/198/EC

Use this certificate for:

- Non-mammalian source (poultry and fish) petfood, dry or semi-moist;
- Mammalian high-risk source petfood, dry or semi-moist.

When using this certificate for non-mammalian source petfood, there is a requirement for identification of the alternative heat treatment used [IV. Attestation, (a)]. Therefore, each approved poultry or fish renderer must identify which type of system they are currently using. The easiest way to accomplish this is to forward each approved poultry renderer a copy of the enclosed Directive 92/562/EEC and ask them to identify which of the 7 acceptable treatment types they are using.

2. Annex B, Animal Health Certificate 97/199/EC

Use this certificate for:

- Non-mammalian, and high and low risk mammalian source petfood, canned.

3. Annex B or Annex C, Animal Health Certificate 94/309/EC

Use this certificate for:

- Mammalian low-risk source petfood, dried and semi-moist.

Other important considerations

All certificates refer to testing requirements for clostridium, salmonella, and enterobacteriaceae. This is what the APHIS approval system established. Therefore, rendered material coming from an APHIS approved renderer need not be tested for these organisms. The only test results which must be presented with a certificate are those for salmonella testing of the final dry or semi-moist finished petfood.

Whenever there is a choice as to whether the protein or product was "produced using ruminant protein or without using ruminant protein", one of these options must be crossed out.

Additional certification statements may be required by France and the U.K. See France and U.K. files for these additional requirements.

Switzerland, a non-EU country, has its own certificate for pet food and dog chews.

These EU certificates may be used for export to Norway, a non-EU country.